

Vanessa R. Waldref
United States Attorney
Eastern District of Washington
Caitlin Baunsgard
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

INDICTMENT

Vio.: 21 U.S.C. § 848,
Continuing Criminal
Enterprise
(Count 1)

21 U.S.C. § 846,
Conspiracy to Distribute
a Controlled Substance
(Counts 2-5, 13)

21 U.S.C. §§ 841(a)(1),
(b)(1)(B)(vi), 846
Attempted Possession
with Intent to Distribute
40 Grams or More of
Fentanyl
(Count 6)

JACENIR AMERZUCA DASILVA (a/k/a
“Serio”),

21 U.S.C. §§ 841(a)(1),
(b)(1)(C), 846
Attempted Possession with
Intent to Distribute Cocaine
(Count 7)

21 U.S.C. § 841(a)(1),
(b)(1)(C),
Distribution of Cocaine
(Counts 8-12)

18 U.S.C. § 1956(h),
Conspiracy to Money
Launder
(Count 14)

18 U.S.C. §§ 922(g)(1),
924(a)(8),
Felon in Possession of a
Firearm
(Count 15)

18 U.S.C. §§ 922(o),
924(a)(2)
Unlawful Possession of a
Machine Gun
(Count 16)

18 U.S.C. § 49
Unlawful Animal Fighting
(Count 17-18)

7 U.S.C. § 2156(f)
18 U.S.C. § 982
18 U.S.C. § 924
21 U.S.C. § 853
21 U.S.C. § 848,

Defendants.

28 U.S.C. § 2461
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by no later than the year 2023, the exact date being unknown to the Grand Jury, and continuously thereafter through and including April 17, 2024, within the Eastern District of Washington and elsewhere, the Defendants, [REDACTED], [REDACTED], [REDACTED], did unlawfully, knowingly, and intentionally engage in a continuing criminal enterprise in that the Defendants unlawfully, knowingly, and intentionally violated, 21 U.S.C. §§ 841(a)(1), 843(b), 846, which violations include but are not limited to Conspiracy to Distribute a Controlled Substance, Unlawful Use of a Communication Facility, Distribution of a Controlled Substance, and Attempted Possession with Intent to Distribute a Controlled Substances, and the substantive violations alleged in Counts 2 through 13, which Counts and overt acts are realleged and incorporated herein by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substances Act, 21 U.S.C. § 801 et seq., undertaken by the Defendants, in concert with at least five other persons with

1 respect to whom Defendants, [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED], occupied positions of organizer, supervisor, and any
6 other position of management, and from which such continuing series of violations the
7 Defendants obtained substantial income and resources; all in violation of 21 U.S.C. §
8 848(a), (c).
9

10
11 COUNT 2

12 Beginning on a date unknown, but by on or about June 2023, and continuing to
13 on or about April 17, 2024, in the Eastern District of Washington and elsewhere, the
14 Defendants, [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED], and other individuals, both known and unknown to the
19 Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree
20 together with each other to commit the following offense: distribution of a mixture or
21 substance containing a detectable amount of synthetic cannabinoids (commonly
22 known as “K2” or “spice”), a Schedule I controlled substance, and buprenorphine
23 (commonly known as Suboxone), a Schedule III controlled substance, both in
24 violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), all in violation of 21 U.S.C. § 846.
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COUNT 3

Beginning on a date unknown, but by on or about September 2023, and continuing to on or about April 17, 2024, in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED], [REDACTED], and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), all in violation of 21 U.S.C. § 846.

COUNT 4

Beginning on a date unknown, but by on or about February 2024, and continuing to on or about April 17, 2024, in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED], [REDACTED], and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide

(a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), all in violation of 21 U.S.C. § 846.

COUNT 5

Beginning on a date unknown, but by on or about July 2023, and continuing to on or about April 17, 2024, in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED], [REDACTED], and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: unlawful use of a communication facility, to wit the United States Mails and United Parcel Service, to facilitate the commission of a felony under the Controlled Substances Act, in violation of 21 U.S.C. § 843(b), all in violation of 21 U.S.C. § 846.

COUNT 6

On or about January 8, 2024, in the Eastern District of Washington and elsewhere, the Defendant, [REDACTED], knowingly attempted to possess with intent to distribute 40 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi), 846.

COUNT 7

On or about January 31, 2024, in the Eastern District of Washington and elsewhere, the Defendant, [REDACTED], knowingly attempted to possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), 846.

COUNT 8

On or about September 13, 2023, in the Eastern District of Washington, the Defendants, [REDACTED], knowingly distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 9

On or about September 27, 2023, in the Eastern District of Washington, the Defendants, [REDACTED], knowingly distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 10

On or about November 1, 2023, in the Eastern District of Washington, the Defendants, [REDACTED], [REDACTED], knowingly distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 11

On or about November 21, 2023, in the Eastern District of Washington, the Defendant, [REDACTED], knowingly distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 12

On or about December 20, 2023, in the Eastern District of Washington, the Defendants, [REDACTED], [REDACTED], knowingly distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 13

Beginning on a date unknown, but by on or March 2024, and continuing to on or about April 17, 2024, in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED], and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of a mixture or substance containing a detectable amount of synthetic cannabinoids (commonly known as “K2” or “spice”), a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), all in violation of 21 U.S.C. § 846.

COUNT 14

Beginning on a date unknown but by on or about June 2023 and continuing until April 17, 2024, in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

1 [REDACTED] JACENIR AMERZUCA

2 DASILVA (a/k/a "Serio"), [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

8 [REDACTED], and others known and unknown, unlawfully and knowingly
9 combined, conspired, confederated and agreed together and with each other to conduct
10 and attempt to conduct financial transactions, that is: transactions involving the
11 movement of funds by wire and other means affecting interstate and foreign
12 commerce, and transactions involving the use of a financial institution which is
13 engaged in and affects interstate and foreign commerce, which involved the proceeds
14 of specified unlawful activity, that is, a continuing criminal enterprise (in violation of
15 21 U.S.C. § 848) and a conspiracy to distribute controlled substances (in violation of
16 21 U.S.C. § 846), to promote the carrying on of a specified unlawful activity, in
17 violation of 18 U.S.C. § 1956(a)(1)(A)(i).
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22 The Grand Jury further alleges this offense was committed during and in
23 furtherance of the continuing criminal enterprise as charged in Count 1, conspiracy to
24 distribute controlled substances as charged in Counts 2-15 and Count 13, above. All
25 in violation of 18 U.S.C. § 1956(h).
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COUNT 15

On or about April 10, 2024, in the Eastern District of Washington, the Defendant, [REDACTED], knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in an affecting commerce, a firearm, to wit: a Ruger Model SP101 .357 caliber revolver, bearing serial number 57141724, which firearm had therefore been transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8).

COUNT 16

On or about January 1, 2024, in the Eastern District of Washington, the Defendant, [REDACTED], did knowingly possess a machine gun, to wit: a semi-automatic firearm with an unlawful modification of the semi-automatic firearm to a fully automatic firearm, commonly referred to as a "Glock switch," in violation of 18 U.S.C. §§ 922(o), 924(a)(2).

COUNT 17

On or about April 7, 2024, in the Eastern District of Washington, the Defendant, [REDACTED], did knowingly sponsor and exhibit an animal, to wit: one or more roosters, in an animal fighting venture, to wit: a cockfight which involved at least 2 animals for the purposes

1 of sport, wagering and entertainment, in or affecting interstate or foreign commerce,
2 in violation of 7 U.S.C. § 2156(a)(1) and 18 U.S.C. § 49.
3

4 COUNT 18

5 Beginning on a date unknown, but by on or about June 2023 and continuing to
6 on or about April 7, 2024, in the Eastern District of Washington, the Defendants,
7

8 [REDACTED]
9 [REDACTED], did knowingly possess and train an animal, to wit: one or more roosters,
10 for the purpose of having the animal(s) participate in an animal fighting venture, to
11 wit: training one or more roosters for a cockfight, which would involve at least 2
12 animals for the purposes of sport, wagering and entertainment, in or affecting
13 interstate or foreign commerce, in violation of 7 U.S.C. § 2156(b) and 18 U.S.C. § 49.
14
15

16 NOTICE OF CRIMINAL FORFEITURE

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18 The allegations set forth in this Indictment are hereby realleged and
19 incorporated by reference for the purpose of alleging forfeitures.
20

21 Controlled Substance Violations

22 Pursuant to 21 U.S.C. § 853 and/or 21 U.S.C. 848(a), upon conviction of an
23 offense(s) in violation of 21 U.S.C. § 848 and/or 21 U.S.C. § 841 and/or 21 U.S.C.
24 846, as set forth in this Indictment, the Defendants [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28

1 [REDACTED]

2 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED] JACENIR AMERZUCA DASILVA (a/k/a "Serio"), [REDACTED]

8 [REDACTED]

9 [REDACTED]

11 [REDACTED]

12 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

18 [REDACTED] shall forfeit to the United States of America, any property

19 constituting, or derived from, any proceeds obtained, directly or indirectly, as the

20 result of such offense(s) and any property used or intended to be used, in any manner

22 or part, to commit or to facilitate the commission of the offense(s). The property to be

23 forfeited includes, but is not limited to:

25 Defendant [REDACTED]

26 Real property known as 191 Buena Loop Road, Zillah, Washington, legally

28 described as follows:

1 The East 330 feet of the West 528 feet of the South half of the Northeast
2 Quarter of the Southeast Quarter of Section 21, Township 11 North,
3 Range 20, E.W.M.

4 EXCEPT the South 25 feet for Road

5 Assessor's Tax Parcel No.: 201121-41024

6 Together with all appurtenances, fixtures, attachments and improvements
7 thereto and thereupon.

8 Subject to all easements, restrictions, reservations and covenants of record.

9 If any of the property described above, as a result of any act or omission of the
10

11 Defendants:

- 12 a. cannot be located upon the exercise of due diligence;
13 b. has been transferred or sold to, or deposited with, a third party;
14 c. has been placed beyond the jurisdiction of the court;
15 d. has been substantially diminished in value; or
16 e. has been commingled with other property which cannot be divided
17 without difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property pursuant
19 to 21 U.S.C. § 853(p).

21 Money Laundering

22 Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of an offense in violation of 18
23 U.S.C. § 1956(h), the Defendants, [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED], JACENIR AMERZUCA DASILVA (a/k/a
“Serio”), [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED], shall forfeit
to the United States of America any property, real or personal, involved in such offense,
and any property traceable to such property.

If any of the property described above, as a result of any act or omission of the
Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant
to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

1 Firearms

2 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of
3
4 an offense in violation of 18 U.S.C. §§ 922(g)(1), 924 (a)(8), Felon in Possession of a
5 Firearm, as set forth in this Indictment, the Defendant, [REDACTED]
6 [REDACTED], shall forfeit to the United States of America any firearm and
7
8 ammunition involved or used in the commission of the offense.

9 If any of the property described above, as a result of any act or omission of the
10 Defendant:
11

- 12 a. cannot be located upon the exercise of due diligence;
13 b. has been transferred or sold to, or deposited with, a third party;
14 c. has been placed beyond the jurisdiction of the court;
15 d. has been substantially diminished in value; or
16 e. has been commingled with other property which cannot be divided
17 without difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property pursuant
19 to 21 U.S.C. § 853(p).
20

21 Unlawful Animal Fighting

22 Pursuant to 7 U.S.C. § 2156(f) and 28 U.S.C. § 2461(c), upon conviction of an
23 offense in violation of 7 U.S.C. § 2156 and 18 U.S.C. § 49, as set forth in this
24 Indictment, the Defendant, [REDACTED]
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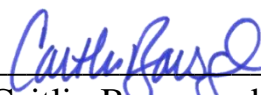
1 [REDACTED], shall forfeit to the United States of America
2 any animal involved in the violations.
3

4 DATED this ____ day of April 2024.

5 A TRUE BILL
6
7

8 _____
9 Foreperson

10 _____
11 Vanessa R. Waldref
12 United States Attorney

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14 Caitlin Baunsgard
15 Assistant United States Attorney
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